

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(Greenbelt)**

In re:

Clifford and Aldebessi Wong

Debtor

\*  
\*  
\*  
\*  
\*  
\*

Case No. 15-19543

Chapter 13

\* \* \* \* \*

**RES-FL FOUR, LLC'S OBJECTION TO  
CONFIRMATION OF DEBTORS' CHAPTER 13 PLAN**

RES-FL FOUR, LLC ("RES"), by its undersigned counsel, pursuant to 11 U.S.C. § 1325, objects to the confirmation of Clifford and Adebessi Wong's (together, the "Debtors") Amended Chapter 13 Plan filed on May 9, 2016 [Dkt. 42] (the "Plan") as follows:

1. RES is a creditor of the Debtors' estate.
2. Under the Plan, the Debtors propose to make plan payments of \$150.00 per month for the first ten months; \$250.00 per month for months 11-48; and \$400.00 per month for the remaining 11 months.
3. As pointed out by the Chapter 13 Trustee's (the "Trustee") Second objection to confirmation [Dkt. 44] (the "Objection"), the Debtors have refused, and continue to refuse, to reduce certain monthly expenses that would free up additional funds for plan payments.
4. Furthermore, and as also pointed out by the Trustee, the Debtors', on the eve of their original Chapter 7 filing, purchased a home and took on a mortgage which takes up more than a third of their net income.
5. Moreover, the Debtors do not propose to distribute property any property on account of RES' claim.
6. Accordingly, the Court should deny confirmation of the Plan in light of the instant objection as the Debtors cannot satisfy Section 1325(b)(1) of the Bankruptcy Code.

7. Additionally, RES hereby incorporates by reference all the objections made by the Trustee in her Objection.

8. RES reserves its right to submit further objection to the confirmation of the Plan

**WHEREFORE**, RES-FL FOUR, LLC respectfully requests that the Court enter an Order denying confirmation of the Debtors' Chapter 13 Plan, dismissing this bankruptcy case, and granting such further relief as is just and appropriate.

Respectfully submitted,

Dated: June 6, 2016

s/ Joshua D. Bradley  
Joshua D. Bradley (ID 28821)  
Rosenberg Martin Greenberg LLP  
25 South Charles Street, 21<sup>st</sup> Floor  
Baltimore, Maryland 21201  
Phone: (410) 727-6600  
Fax: (410) 727-1115  
E-Mail: [jbradley@rosenbergmartin.com](mailto:jbradley@rosenbergmartin.com)

*Attorneys for RES-FL FOUR, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY, that on this 6<sup>th</sup> day of June 2016, a copy of the foregoing  
Objection to Confirmation of Debtors' Chapter 13 Plan, was served on the following persons, via  
ECF and/or first class U.S. mail, postage prepaid.

US Trustee  
US Trustee – Greenbelt  
6305 Ivy Lane, Suite 600  
Greenbelt, Maryland 20770

Robert K. Goren  
Goren & Tucci, LLC  
177 Kentlands Blvd  
Suite 200  
Gaithersburg, MD 20878

Nancy Spencer Grigsby  
4201 Mitchellville Road  
Suite 401  
Bowie, MD 20716

/s/ Joshua D. Bradley  
Joshua D. Bradley

ND: 4819-9669-3804, v. 1